

1 CLEMENT SETH ROBERTS (STATE BAR NO. 209203)
croberts@orrick.com
2 BAS DE BLANK (STATE BAR NO. 191487)
basdeblank@orrick.com
3 ALYSSA CARIDIS (STATE BAR NO. 260103)
acaridis@orrick.com
4 EVAN D. BREWER (STATE BAR NO. 304411)
ebrewer@orrick.com
5 ORRICK, HERRINGTON & SUTCLIFFE LLP
The Orrick Building
6 405 Howard Street
San Francisco, CA 94105-2669
7 Telephone: +1 415 773 5700
Facsimile: +1 415 773 5759
8

SEAN M. SULLIVAN (*pro hac vice*)
sullivan@ls3ip.com
9 COLE B. RICHTER (*pro hac vice*)
richter@ls3ip.com
10 LEE SULLIVAN SHEA & SMITH LLP
656 W Randolph St., Floor 5W
11 Chicago, IL 60661
12 Telephone: +1 312 754 0002
Facsimile: +1 312 754 0003
13

Attorneys for Defendant Sonos, Inc.

14
15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA,
17 SAN FRANCISCO DIVISION
18

19 GOOGLE LLC,
20 Plaintiff,
21 v.
22 SONOS, INC.,
23 Defendant.
24
25
26
27
28

Case No. 3:20-cv-06754-WHA

**SONOS, INC.'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

I. INTRODUCTION

Pursuant to Civil Local Rule 79-5(f), Defendant Sonos, Inc. (“Sonos”) hereby respectfully submits this Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) in connection with Sonos, Inc.’s Answer to Google LLC’s Second Amended Complaint and Sonos, Inc.’s Counterclaims (“Sonos’s Answer to SAC”). Specifically, Sonos seeks to file under seal the information and documents listed below:

DOCUMENT	PORTIONS TO BE SEALED	DESIGNATING PARTY
Sonos’s Answer to SAC	Portions highlighted in green	Google
Exhibit AU to Sonos’s Answer to SAC	Entire Document	Google
Exhibit AV to Sonos’s Answer to SAC	Entire Document	Google
Exhibit AW to Sonos’s Answer to SAC	Entire Document	Google
Exhibit AX to Sonos’s Answer to SAC	Entire Document	Google
Exhibit AY to Sonos’s Answer to SAC	Entire Document	Google
Exhibit AZ to Sonos’s Answer to SAC	Entire Document	Google
Exhibit BA to Sonos’s Answer to SAC	Entire Document	Google
Exhibit BB to Sonos’s Answer to SAC	Entire Document	Google
Exhibit BC to Sonos’s Answer to SAC	Entire Document	Google
Exhibit BD to Sonos’s Answer to SAC	Entire Document	Google
Exhibit BE to Sonos’s Answer to SAC	Entire Document	Google
Exhibit BG to Sonos’s Answer to SAC	Entire Document	Google
Exhibit BH to Sonos’s Answer to SAC	Entire Document	Google
Exhibit BI to Sonos’s Answer to SAC	Entire Document	Google
Exhibit BJ to Sonos’s Answer to SAC	Entire Document	Google
Exhibit BL to Sonos’s Answer to SAC	Entire Document	Google
Exhibit BM to Sonos’s Answer to SAC	Entire Document	Google
Exhibit BO to Sonos’s Answer to SAC	Entire Document	Google
Exhibit BP to Sonos’s Answer to SAC	Entire Document	Google
Exhibit CC to Sonos’s Answer to SAC	Entire Document	Google
Exhibit CD to Sonos’s Answer to SAC	Entire Document	Google
Exhibit CE to Sonos’s Answer to SAC	Entire Document	Google

DOCUMENT	PORTIONS TO BE SEALED	DESIGNATING PARTY
Exhibit CI to Sonos's Answer to SAC	Entire Document	Google
Exhibit CJ to Sonos's Answer to SAC	Entire Document	Google
Exhibit CK to Sonos's Answer to SAC	Entire Document	Google
Exhibit CL to Sonos's Answer to SAC	Entire Document	Google

II. LEGAL STANDARD

Materials and documents may be provisionally filed under seal pursuant to Civil Local Rule 79-5(f) when the document, or portions thereof, "has been designated as confidential by another party or non-party." *See* L.R. 79-5(f).

III. GOOGLE'S CONFIDENTIAL INFORMATION

Sonos seeks to seal certain portions of Sonos's Answer to SAC and documents filed in support thereof because they may contain information that Google LLC ("Google") considers Confidential and/or Highly Confidential-Attorneys' Eyes Only and/or Highly Confidential-Source Code pursuant to the Protective Order entered by this Court. Dkt. 92. Sonos takes no position on the merits of sealing Google's designated material, and expects Google to file one or more declarations in accordance with the Local Rules.

IV. CONCLUSION

In compliance with Civil Local Rule 79-5(d) and (e), redacted and unredacted versions of the above-listed documents accompany this Administrative Motion. A proposed order is being filed concurrently herewith. For the foregoing reasons, Sonos respectfully requests that the Court grant Sonos's Administrative Motion.

1 Dated: February 18, 2022

2
3 By: /s/ Cole B. Richter

4 CLEMENT SETH ROBERTS
5 ALYSSA CARIDIS
6 EVAN D. BREWER

7 ORRICK, HERRINGTON & SUTCLIFFE LLP

8 GEORGE I. LEE
9 SEAN M. SULLIVAN
10 COLE B. RICHTER
11 RORY P. SHEA
12 J. DAN SMITH

13 LEE SULLIVAN SHEA & SMITH LLP

14 *Attorneys for Defendant Sonos, Inc.*